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8 AND

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14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 BASKIM HOLDINGS, INC., a Louisiana
corporation,

17 Plaintiff

18 v.

19 TWO M, INC. d/b/a BABE'S CABARET

20 Defendant

Case No.: 2:16-cv-01898-APG-GWF

21 **STIPULATION AND ORDER TO**
22 **RESCHEDULE DEPOSITIONS**

23 Defendants, Two M, Inc. and Omar Aldabbagh, and plaintiff, Baskim Holdings, Inc. (the
24 "Parties"), respectfully request that the Court extend the time for the Parties to take certain

1 depositions previously ordered to be completed by October 27, 2017 deadline to complete
2 discovery (ECF No. 84). In support of this request, the Parties state:

3 1. On May 24, 2017, the Court granted Defendants' second request to extend the
4 remaining pre-trial deadlines an additional forty-five days; the discovery deadline was extended
5 to July 27, 2017; the dispositive motion deadline was extended to August 28, 2017; and the joint
6 pre-trial order deadline was extended to September 28, 2017, unless dispositive motions were
7 pending.¹ (ECF No. 53).

8 2. After discovery was completed, Defendants filed their motion seeking a third
9 extension (ECF No. 62) on the basis that additional discovery was needed relating to Baskim's
10 licensing agreements and a Nunc Pro Tunc Agreement; the licensing agreements were delivered
11 to Defendants by electronic mail on July 19, 2017; the Nunc Pro Tunc Assignment was mailed to
Defendants on July 27, 2017.

12 3. Following a hearing, the Court granted Defendants' motion and allowed
13 Defendants sixty (60) days to conduct limited discovery relating to Baskim's licensing agreements
14 and the Nunc Pro Tunc Agreement. (ECF No. 84).

15 4. On September 27, 2017, Defendants issued their fourth set of written discovery
16 requests directed towards issues related to the licensing agreements and the Nunc Pro Tunc
Agreement; responses to these requests are due on October 27, 2017.

17 5. Defendants also wish to take the following depositions: (i) Baskim's continued
18 Rule 30(b)(6) deposition; (ii) Rule 30(b)(6) deposition of RMDR Investments, Inc. ("RMDR"),
19 and Jordan Bass. Baskim and RMDR's corporate representatives, as well as Jordan Bass, all reside
20 in New Jersey.

21 6. Given the outstanding discovery, and in an effort to save the Parties' time and
22 expense, the Parties have agreed to reschedule Baskim's Rule 30(b)(6) deposition for a mutually

23 ¹ On August 28, 2017, Defendants filed their second and third motions for summary judgment.
24 (ECF Nos. 80 and 81). These motions are still pending.

1 convenient date in January, 2018, when Baskim's representative will be in Las Vegas, Nevada.
2 The Parties further agree that, if necessary, Baskim will make available RMDR and Jordan Bass
3 for deposition in New Jersey within forty-five (45) days of Baskim's deposition (collectively, the
4 "Depositions"). All of these Depositions are to be limited in scope to the topics discussed in
5 Magistrate Foley's Order (ECF No. 84).

6 7. Accordingly, the Parties request that the Court order the continued Rule 30(b)(6)
7 deposition of Baskim to take place in Las Vegas at a mutually convenient date in January, 2018.
8 Furthermore, if necessary, Defendants may take the Rule 30(b)(6) deposition of RMDR and Jordan
9 Bass in New Jersey within forty-five (45) days after Baskim's deposition.

10 8. Should either Party learn new information during the Depositions relating to the
11 limited discovery topics identified in Magistrate Foley's Order (ECF No. 84), and that new
12 information requires additional discovery, the Party seeking discovery shall be required to seek
13 leave of court and obtain an order before pursuing any additional discovery.

14 9. Nothing in this stipulation is intended to extend any pre-trial deadlines already set
15 by the Court, with the exception of allowing the Depositions described herein to take place.

16 WHEREFORE, the Parties requests that the Depositions be rescheduled pursuant to the
17 terms set forth above.

18 **IT IS SO ORDERED:**

19 Dated: October 23 , 2017

20 
21 UNITED STATES MAGISTRATE JUDGE

22 Dated this 13th day of October, 2017.

23 Dated this 13th day of October, 2017.

24 /s/ Greg Latham
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